

TIMOTHY A. FUSCO (MI P13768)  
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*Attorneys for County of Wayne, Michigan*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

GENERAL MOTORS CORP., *et al.*,

Case No. 09-50026 (REG)

Debtors.

(Jointly Administered)

Judge Robert E. Gerber

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**MOTION FOR ADMISSION *PRO HAC VICE***

Timothy A. Fusco, a member in good standing of the State Bar of Michigan, and the United States District Court for the Eastern District of Michigan, states as follows for his Motion for Admission *Pro Hac Vice* to represent the County of Wayne, Michigan:

1. I am senior counsel with Miller, Canfield, Paddock and Stone, P.L.C., resident in the firm's Detroit, Michigan office located at 150 West Jefferson Avenue, Suite 2500, Detroit, MI 48226. My e-mail address is fusco@millercanfield.com, and my direct dial telephone number is (313) 496-8435.

2. I am a member in good standing of the State Bar of Michigan and the bar of the United States District Court for the Eastern District of Michigan.

3. I am in good standing in each of the Courts listed above in Paragraph 2 and am eligible to practice in this Court pursuant to Rule 2090-1 of the Local Rules for the Bankruptcy Court for the Southern District of New York. I have never been suspended or disciplined by any Bar or any Court and have never been the subject of any grievance procedure. I have never been denied *pro hac vice* admission in this District. My Michigan Bar Number is P13768.

4. I have paid the fee of \$25.00 with the filing of this Motion for an order admitting me to practice *pro hac vice* in this case.

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By /s/ Timothy A. Fusco  
Timothy A. Fusco (MI P13768)  
Attorneys for County of Wayne, Michigan  
150 West Jefferson Avenue, Suite 2500  
Detroit, MI 48226  
Telephone: (313) 963-8435  
Fax: (313) 496-8452  
Email: fusco@millercanfield.com

Dated: June 17, 2009

**AFFIRMATION**

I, Timothy A. Fusco, affirm that I have read the above Motion for Admission *Pro Hac Vice* and the statements contained therein are true to the best of my knowledge, information, and belief.

By /s/ Timothy A. Fusco  
Timothy A. Fusco (MI P13768)  
Attorneys for County of Wayne, Michigan  
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Detroit, MI 48226  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* was served via electronic transmission and first class U.S. mail, postage prepaid, upon Debtor's counsel of record, Harvey R. Miller and Stephen Karotkin, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153 on the 17th day of June, 2009.

By /s/ Timothy A. Fusco  
Timothy A. Fusco (MI P13768)  
Attorneys for County of Wayne, Michigan  
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Detroit, MI 48226  
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